



April 16, 2007

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Ex Parte Notice; CC Docket No. 95-116**

Dear Ms. Dortch:

In response to a recent request from Wireline Competition Bureau and Competition Policy Division staff, this letter **will** provide supplemental information concerning several of the issues raised in the February 8, 2007 comments of Charter Communications, Inc. ("Charter") in the above referenced docket. Pursuant to Commission rules this letter **is** being filed with the Secretary for inclusion in the record **of** the above captioned proceedings.

*Uniform Porting Intervals*

As noted in recent meetings with FCC staff, the Commission should reaffirm uniform porting intervals to remove barriers to entry and to promote competition in the voice marketplace. One of the main hurdles faced in completing simple ports is the protracted porting intervals of some carriers. Charter completes all requests from other entities to port out its own telephone numbers within the four **day** interval required under current FCC regulations. *See* Exhibit 1 attached hereto. The document included in Exhibit 1 is **a** copy of Charter's own number porting operations manual, which describes the manner in which Charter responds to port requests from other telephone companies. As noted in the "Business Rules" section of that document, Charter completes **all** of its ports within the four day interval required under current FCC regulations.

In contrast to Charter's efficient and timely processes, many other telephone companies and VoIP providers do not complete ports within the four day interval required of FCC regulations. Indeed, in Charter's experience there *are* quite **a** few companies, both local exchange carriers **and** VoIP providers, which utilize significantly greater intervals. For its own internal operating procedures Charter has prepared **a** matrix of all those companies that port numbers to Charter, many of whom have publicly declared porting intervals in **excess** of the four day interval. *See* Exhibit 2 attached hereto. As **is** evident from the attached matrix, there are a

number of companies that routinely exceed the four day interval period as well as companies who maintain intervals grossly beyond the four day interval required under FCC regulations.’

In contrast to those carriers whose lengthy porting intervals frustrate competitive choice, at least one LEC has voluntarily agreed to engage in porting activity on Saturdays, or certain holidays. This practice employed by AT&T expands the window of time in which ports can be effectuated, and also reduces the burden on customers who must be at home to receive a technician prior to completing the port process. For that reason, the Commission should order all carriers to adopt this “best practice” of facilitating port requests on Saturdays and certain holidays.

#### *Extraneous Pre-Porting Obligations*

In addition, at least one interconnected voice over Internet protocol (“VoIP”) provider creates additional barriers to efficient porting by insisting that the requesting carrier provide extraneous information prior to issuing a port request to the VoIP provider. Specifically, every time that Charter seeks to port a number from Vonage, Charter must first complete a complicated account verification process before Vonage will agree to port any number from its network.

Specifically, every time a port request is submitted for a number used by a Vonage customer, the request must be accompanied with a “hard or soft copy of the customer’s Vonage account page.” To do so the customer must take the following steps *before* the “winning carrier” can request that Vonage port the number to it: (1) visit the Vonage website and log into their account with valid user name **and** password, (2) obtain a “screen shot” of the account page, (3) e-mail the account information (in the form of a screen shot) to the carrier that will request the port. This information must then be presented to Vonage by the winning carrier (that requests the number port) along with a supplemental LSR (port request). Obviously, this laborious and time-consuming process does not lend itself to efficient number porting.

#### *Cancellation of Service Where Ports Are Delayed*

Another concern noted by Charter in its comments; is the fact that certain carriers utilize so-called late cancel policies which can result in termination of service if the port is not completed prior to a specific deadline (which differs for individual LECs) on that day. This practice creates significant problems, including the possible loss of service to the customer including critical E911 emergency access.

As noted in Charter’s comments the use of so-called “late cancel” policies unnecessarily undermine efficient porting processes. More significantly, they can also result in a loss of

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<sup>1</sup> See *In the Matter of Telephone Number Portability; CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues*, Memorandum Opinion and Order and Further NPRM, 18 FCC Rcd 23697, ¶ 38 (2003) (reaffirming rule that wireline-to-wireline interval for ports is four business days, as established in the 1997 NANC Final Working Group Report and Recommendation).

<sup>2</sup> Charter Comments, WC Docket No. 95-116 at 7-9 (filed Feb. 8, 2007) (“Charter Comments”).

service, including *loss of E911 emergency communications services*, in violation of the Commission's rules.<sup>3</sup> To avoid this result at least one incumbent LEC ensures that subscribers will not lose their service when this occurs by maintaining the telephone number in its switch for a short period of time after the customer migrates to the requesting LEC. The Commission should order all carriers to incorporate this "best practice" used by AT&T and maintain the telephone number in its switch for a period of at least seventy-two hours after the port is effected. Doing so will ensure that customers would not be left without service in the event of a port that is cancelled after the deadlines set by each individual company. Moreover, this requirement would not impose any significant costs on the porting-out carrier, and represents only a minimal burden when compared to the consumer benefit of ensuring no loss of service (including 911 service) in these circumstances.

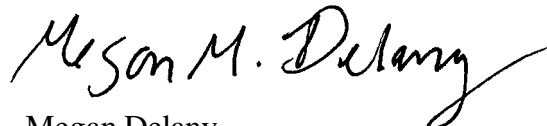
*Making Information Available to Requesting LEC Via Web-based GUIs*

Another issue raised in Charter's comments was the fact there is often insufficient information available to Charter at the time a port request is submitted.<sup>4</sup> This, in turn, leads to a greater likelihood that the port will be rejected if some of the validation data is insufficient or invalid. In contrast to the problems noted by Charter, some carriers, including AT&T, Verizon and Qwest, do provide that information through the use of a web-based graphical user interface ("GUI") that offers real time customer service information. Such information normally includes billing name and address, which the requesting carrier can use to ensure the port request accurately conveys that information. In addition, these carriers often make available additional information concerning certain adjunct features or services used by the customer. If such information were not available to the requesting LEC, the possibility of port rejects would increase dramatically. Thus, the provision of customer information through web-based GUIs minimizes the possibility of unnecessary rejections of port requests. For that reason, the Commission should order all carriers to adopt this "best practice" of providing certain pre-order information.

Please contact the undersigned if you have any questions about this matter.

Very truly yours,

Charter Communications

A handwritten signature in black ink that reads "Megan M. Delany". The signature is fluid and cursive, with the first name "Megan" and last name "Delany" clearly legible.

Megan Delany  
Sr. Director and Legislative Counsel,  
Federal Government Relations

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<sup>3</sup> See 47 C.F.R. § 64.3001, *et. seq.*

<sup>4</sup> Charter Comments at 9-11.

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cc: Randolph Clarke  
Marcus Maher  
Rodney McDonald  
Tom Navin  
Christi Shewman  
Ann Stevens

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# **EXHIBIT 1**



# LNP-206 Charter Local Number Portability Charter Telephone Service Operations Manual

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## Overview

Assumptions	<ul style="list-style-type: none"> <li>◆ Customer account is current</li> </ul>
Business Rules	<ul style="list-style-type: none"> <li>◆ The porting interval for residential numbers is a minimum of 3 business days</li> <li>◆ An FOC will be emailed to the new CLEC within 48 hours or 2 business days of receiving the LSR</li> <li>◆ The LSR customer information must match customer profile in the Charter billing system</li> <li>◆ LSR change requests require a supplemental order               <ul style="list-style-type: none"> <li>○ A supplemental order will be used for a due date change as well as a change or correction to information provided on the original LSR</li> </ul> </li> <li>◆ A same day cancellation and reschedule request must be received by 5:00 pm on the scheduled due date               <ul style="list-style-type: none"> <li>○ Charter will initiate the concurrence in SOA</li> <li>○ The new CLEC will accept the concurrence</li> <li>○ The ported number will be removed from the switch between 8:00 am and 12:00 noon the next business day following the scheduled port date</li> </ul> </li> <li>◆ The new CLEC is responsible for LIDB and/or CARE record update/removal that may be required in connection with the port out</li> <li>◆ Charter will send a unlock record to remove the ported number from 911 will be sent once the order is posted as complete               <ul style="list-style-type: none"> <li>○ The new CLEC will send a migrate notification to 911</li> </ul> </li> <li>◆ Charter will send a DSR to remove a number listed in the local directory               <ul style="list-style-type: none"> <li>○ The new CLEC will submit a DSR to the directory provider for the number to remain listed</li> </ul> </li> </ul>
Updates	<p>Version number.....v1.05</p> <p>Revision detail:       Contact Numbers Updated</p> <p>Date of last revision:  07.14.05</p> <p>Revised by:            Julie Gorrell</p> <p>Date created..... 3.23.04</p>

## Process Details

<b>A. Send LSR, EU &amp; NP</b>	<p>The CLEC will <b>send</b> the Local Service Request (LSR), End User Form (EU) and Number Portability Form (NP) to the email address of <a href="mailto:CHARTER.STL.LSR@CHARTERCOM.COM">CHARTER.STL.LSR@CHARTERCOM.COM</a></p> <p><i><b>Note;</b> The new CLEC <b>must</b> obtain proper authorization (written signature on LOA, TPV or LOA <b>with electronic signature</b>) <del>from</del> the End User prior to the CSI request and <b>LSR being sent</b>.</i></p>
<b>B. Send FOC</b>	<p>Charter will <b>issue</b> a Firm Order Commitment (FOC) to the CLEC. The FOC <b>contains</b> confirmation of the number being ported, <b>who</b> initiated the request and the <b>due</b> date of when the number will <b>be ported</b>.</p> <p><i><b>Note:</b> The FOC <b>will be</b> emailed to <b>the new</b> CLEC within 48 hours (2 business days) of receipt <b>of</b> a clean LSR.</i></p>
<b>C. Update SOA</b>	<p>LNP initiates the subscription for concurrence of the number in SOA (Service Order Activation).</p>
<b>D. Update LIDB/CARE</b>	<p>The CLEC is responsible for any LIDB/CARE update/removal <b>that may be</b> required in connection with the port <b>out</b> request.</p>
<b>E. Send Unlock Record</b>	<p>Charter will <b>send</b> an unlock record to remove the ported number from 911 once the order is posted as complete. The new CLEC will <b>send</b> a migrate notification to 911.</p>
<b>F. Update Directory</b>	<p>If the ported number is listed in the local directory, Charter will <b>send</b> a DSR to have the listing removed. The new CLEC will submit DSR to the directory provider for the number to remain listed.</p>



## Escalation Contact List

### LNP Team

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LNP Voicemail Box 314-288-3350

### Supervisor

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Cherie Jones 314-288-3289  
Beth Lankford 314-288-3268

### Manager

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Julie Gorrell 314-288-3232

### Carrier Relations

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314-288-3257 314- 288-3346

### Trouble Ticket Management (TTM) 24 X 7

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866-207-3773 Option 3

### Customer Care

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866-207-3663 Option 2

## Escalation Procedures

<b>A. First Point of Contact</b>	CLEC should contact Charter LNP Representative.
<b>B. Second Point of Contact</b>	If the issue is not resolved at the first point of contact (LNP Representative level) a CLEC supervisor should contact the Charter LNP Supervisor.
<b>C. Third Point of Contact</b>	If the issue is still not resolved contact the Charter LNP Manager

**Service related issues after the scheduled port date or after business hours should be directed to the Charter Trouble Ticket Management group.**

**Interconnection Agreement issues should be directed to Charter Telephone Service Carrier Relations Manager.**

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## **EXHIBIT 2**

Local Exchange Carrier	Porting Interval
1STEL	5 Days
24/7 Telecom	5 Days
4-A-Phone	3 Days
Acceris	3 Days
Access America	3 Days
Access Integrated	3 Days
Access Line	5 days
Access Point	3 Days
ACN Communications	3 Days
Adelphia	5 Days
Aeneas	7 days
Airtouch Communications	3 Days
Allegiance	7 Days
Alltel Wireless	5 days
Ameritech	3 days
Angles Communication Soluntions	3 Days
AOL Talk Wave	7 Days
AT&T	3 Days
A Call Vantage	5 Days
Atlanta NW	3 Days
Bellsouth	3 days
Bellsouth Mobility	3 Days
Big River Telephone	3 Days
Big River Telephone	5 Days
Birch Telecom	5 Days
Birch Telecom	3 Days
Blue Casa	3 Days
Blue Licence Holding	3 Days
Bristol Utilities Board	3 Days
Bristol Tennessee Essential Services	5 Days
Broadlink	3 Days
Broadview Networks	5 Days
Broadwing	10 Days
BTES	5 Days

<b>BTI</b>	<b>5 days</b>
<b>Budget</b>	<b>5 Days</b>
<b>Bullseyetelecom</b>	<b>3 Days</b>
<b>Cable Vision</b>	<b>5 Days</b>
<b>Caprock</b>	<b>3 Days</b>
<b>Cardia</b>	<b>3 Days</b>
<b>Cat Communications</b>	<b>3 Days</b>
<b>Cavalier</b>	<b>3 Days</b>
<b>Cavalier Telephone</b>	<b>5 Days</b>
<b>C-Beyond</b>	<b>7 Days</b>
<b>CCI</b>	<b>3 Days</b>
<b>Cellcom TSI/2</b>	<b>10 Days</b>
<b>Cellular One</b>	<b>10 Days</b>
<b>Century Tel</b>	<b>5 Days</b>
<b>Central Telephone of NC</b>	<b>3 Days</b>
<b>Champion</b>	<b>7 Days</b>
<b>Chibardun Telephone</b>	
<b>Cooperative/CTC</b>	<b>5 Days</b>
<b>Cingular Wireless</b>	<b>10 days</b>
<b>Cinergy Communications</b>	<b>5 days</b>
<b>Citizens</b>	<b>5 Days</b>
<b>Choice One</b>	<b>5 Days</b>
<b>Clear Tel</b>	<b>3 Days</b>
<b>Close Call America</b>	<b>10 Days</b>
<b>Comcast</b>	<b>3 Days</b>
<b>CommPartners</b>	<b>5 Days</b>
<b>Computerpro</b>	<b>5 Days</b>
<b>Community Connect</b>	<b>3 Days</b>
<b>Community Telephone</b>	<b>5 Days</b>
<b>Concord/TDS</b>	<b>5 Days</b>
<b>Concordia</b>	<b>3 Days</b>
<b>Connect Now</b>	<b>3 Days</b>
<b>Conneticut Telephone</b>	<b>3 Days</b>
<b>Conversant Communications</b>	<b>5 Days</b>
<b>Convesco</b>	<b>3 Days</b>
<b>Covista</b>	<b>3 Days</b>
<b>CPC</b>	<b>3 Days</b>
<b>CP Telecom</b>	<b>5 Days</b>
<b>Crickett Communications</b>	<b>3 Days</b>
<b>Crystal Clear Communications</b>	<b>3 Days</b>

<b>Crystal Communications</b>	<b>4 Days</b>
<b>CTC Telecon: See also Chibardun TN</b>	<b>5 Days</b>
<b>CTC</b>	<b>3 Days</b>
<b>CTC Communications</b>	<b>5 Days</b>
<b>CTI</b>	<b>3 Days</b>
<b>Dalton Utilities</b>	<b>3 Days</b>
<b>Deltacom</b>	<b>5 Days</b>
<b>Digi Phone</b>	<b>3 Days</b>
<b>Digital Agent LLC</b>	<b>10 Days</b>
<b>Digital Telecommunications</b>	<b>6 Days</b>
<b>DM Broadband</b>	<b>3 Days</b>
<b>DMR</b>	<b>3 Days</b>
<b>DPI</b>	<b>3 Days</b>
<b>Earthlink</b>	<b>7 Days</b>
<b>East Tennessee Networks</b>	<b>3 Days</b>
<b>Easy Communications</b>	<b>3 Days</b>
<b>ECG</b>	<b>3 Days</b>
<b>Einstien PCS</b>	<b>3 Days</b>
<b>Embarq</b>	<b>3 Days</b>
<b>Epicus</b>	<b>3 Days</b>
<b>Eureka Info Hwy</b>	<b>3 Days</b>
<b>Excel Communications</b>	
<b>Excel Communications</b>	<b>3 Days</b>
<b>FDN Communications</b>	<b>5 Days</b>
<b>Fibernet</b>	
<b>Fletel Inc</b>	<b>3 Days</b>
<b>Florida Digital Network</b>	<b>5 Days</b>
<b>Focal/Broadwing Comm</b>	<b>10 Days</b>
<b>Fones 4 All</b>	<b>3 Days</b>
<b>Freedom Communications</b>	<b>3 Days</b>
<b>Frontier</b>	<b>5 Days</b>
<b>Galaxy Voice</b>	<b>5 Days</b>
<b>Genuine Telephone</b>	<b>5 Days</b>
<b>Global Communications</b>	<b>6 Days</b>
<b>Global Connection</b>	<b>3 Days</b>
<b>Global Crossing</b>	<b>5 Days</b>
<b>Gtobal Crossing</b>	<b>3 Days</b>
<b>Global Warning</b>	<b>3 Days</b>
<b>Communications</b>	<b>5 Days</b>

Grande Communication	3 Days
Granite Communications	3 Days
Grapevine	3 Days
Hiawatha Broadband Communications	3 Days
Hickory Tech	4 Days
ITC Deltacom	5 days
III T	3 Days
ITP	7 Days
Jackson Energy Authority	5 Days
Jaguar Communications	5 Days
JED	7 Days
.....ications	3 Days
KMC II	5 Days
KMCTelecom	3 Days
Knology	5 Days
Lakedale Link	3 Days
Lake View	3 Days
Lecstar	3 Days
Level 3	7 Days
Lightspeed Communications	3 Days
Light Year Alliance	7 Days
Light Year Communications	3 Days
Lingo	7 Days
Local Phone Company	3 Days
	5 Days
Mainstreet Communications	3 Days
Mankato Citizens Telephone	4 Days
Merimac Communications, Ltd	5 Days
Metropolitan Communications	3 days
MCI	3 days
MCI the Neighborhood	3 days
Mcleod	3 days
Mid Missouri Cellular	10 Days
Millinium	3 Days
Momentum	3 Days
Morristown Utility	5 Day
MountainNet	3 Day
Mpower	10 Days
Mpower	5 Days

MUS Fibernet	5 Days
My People	7 Days
My Phone Company	7Days
My Telephone Company	7 Days
Net Logic	7 Days
Network Tel	3 Days
Nexboom	7 Days
Nexphone	3 Days
Nextra Communications	5 Days
New England Voice and Data	5 Days
New Phone	3 days
New South	3 days
New Smyrna	3 Days
NorthStar Access	4 Days
NorthwestTel In.	3 Days
Now Communications	3 days
Nuvio	7 Days
Nuvox	7 Days
Once Communications	5 Days
One Source	3 Days
One Tone Telecom	3 Days
Onvoy	5 Days
Pacbell	3 days
Pacific Centrex SVC	5-7 Days
Packet 8	7 Days
PacWest	3 Days
Paetec	10 Days
Parker Fibernet	3 Days
Peak Communications	3 Days
Piedmont Rural Telephone	3 days
Piedmont Rural Telephone	3 Days
Point Communications	5 days
Portable Phones	3 days
Powercom	3 days
Prairie Wave	5 Days
Primus	7 Days
Qwest	3 days
Reedsburg	5 Days
Ring Again	3 days
RNK	5 Days



Sage	3 days
SBC	3 Days
SDN	5 Days
Snet (SBC CT)	3 Days
Solarus	5 Days
(Southern Illinois Communications	3 Days
South Carolina Net	5 Days
Speak Easy	7 Days
Spectrotel	3 Days
Sprint	3 Days
Sprint	3 Days
Sports Center	3 Days
SunCom	2 Days
Sun Rocket	7 Days
Syniverse Clearinghouse	10 Days
Talk America	7 Days
Talk America	3 Days
TCG	3 Days
TDS Telecom	5 Days
TDS Metrocom	7 Days
Tech Communications or Tech.Com	5 Days
Telcove	5 Days
Telephone Associates	3 Days
Telscape	5 Days
Textlink	10 Days
The Local Phone Company	3 Days
Time Warner	3 Days
Time Warner	5 Days
T-Mobile	10 Days
Tomato Vine	7 Days
TouchTone.Com	7 Days
Trinsic	3 Days
Trintic	3 days
Triton PCS	2 Days
U-Dial	3 Days
Undial	3 Days
Undial	7 Days

United Inter-Mountain Telephone	3 days
United States Cell of WA	10 Days
Universal Telecom	3 Days
USA Telephone	3 days
US Cellular	5 Days
US Data Network	10 Days
US Exchange LLC	5 Days
US Lec	7 Days
US Lec	5 Days
US Link	5 Days
US Sonnet	3 Day
Vartec	3 days
Verizon East	3 days
Verizon West	3 days
Veriton Voice Wing	7 Days
Verizon Wireless	10 days
Vertex	3 days
Via Talk	7 Days
VI Tech	3 Days
Vonage	10 Days
Vycera	3 Days
Waunakee Telepone Company	5 Days
West Carolina Communications	5 days
West Wisconsin	5 Days
WH Communications	5 Days
WH Link	5 Days
Woodbury	4 days
Wood County Telephone	5 days
XO Communications	7 Days
Xspedius	10 Days
XTN	3 Days
Zingo	3 Days
